1 2 3 4 5 6 7 8 9	PAMELA Y. PRICE, ESQ. (STATE BAR NO PRICE AND ASSOCIATES A Professional Law Corporation The Latham Square Building 1611 Telegraph Avenue, Suite 1450 Oakland, CA 94612 Telephone: (510) 452-0292 Facsimile: (510) 452-5625 Attorneys for Plaintiff M. HOPE YOUNG JOSEPH P. RUSSONIELLO (SBN 44332) United States Attorney JOANN M. SWANSON (SBN 88143) Chief, Civil Division JONATHAN U. LEE (SBN 148792) Assistant United States Attorney 450 Golden Gate Avenue, Ninth Floor San Francisco, California 94102	O. 107713)	
11 12	Telephone: (415) 436-6909 Facsimile: (415) 436-6748 Email: jonathan.lee@usdoj.gov Attorneys for Federal Defendant		
13	UNITED STATES DISTRICT COURT		
14	NORTHERN DISTRICT OF CALIFORNIA		
15	SAN FRANCISCO DIVISION		
16	M. HOPE YOUNG,	No. C 07-2413 JSW	
17	Plaintiff,	STIPULATION AND PROPOSED	
18	v.	ORDER TO EXTEND THE TIME FOR FURTHER MEDIATION BY 30 DAYS	
19	ALPHONSO JACKSON, SECRETARY OF	AND THE DISCOVERY DEADLINE	
20	THE DEPARTMENT OF HOUSING AND) URBAN DEVELOPMENT;		
21	Defendant.		
22)	
23	The parties attended a mediation session with Luella Nelson on March 18, 2008. The case		
24	did not settle at the mediation. Counsel for defendant was out of state from March 21-30, 2008.		
25	Upon his return, discussions between counsel have resumed and both counsel of record believe		
26	that further discussions at a further session with Ms. Nelson would be worthwhile.		
27	The case management calendar set by the Court in December 2007 calls for completion of		
28	fact discovery by April 21, 2008. The case management order also limited both sides to 2		
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depositions and a single set of document requests before mediation. If this matter does not settle, 1 2 a significant amount of discovery remains to be completed. Under these circumstances, the 3 parties make this request so that their resources may be directed at exploring informal resolution of the litigation rather than discovery. 4 5 The first available date on Ms. Nelson's calendar, that the parties and counsel can also make, 6 is April 28, 2008, and discussions are ongoing with the parties' principals to achieve that date. 7 Therefore, the parties through their counsel of record stipulate to the following and request 8 that the Court sign the attached proposed order: 9 1. The parties may attend additional mediation sessions with Ms. Nelson, as 10 warranted, through May 14, 2008. 11 2. The close of non-expert discovery is extended from April 21, 2008 to June 15, 2008. 12 3. 13 The other case management dates remain unchanged. The parties will attend a further case management conference on May 9, 2008 as specified in the case 14 15 management order. 16 SO STIPULATED. 17 DATED: April 7, 2008 PRICE AND ASSOCIATES PAMELA Y. PRICE 18 Attorneys for Plaintiff M. HOPE YOUNG 19 20 DATED: April 7, 2008 JOSEPH P. RUSSONIELLO **United States Attorney** 21 JONATHAN U. LEE 22 Assistant United States Attorney Attorneys for Defendant JACKSON 23 24 PROPOSED ORDER 25 IT IS SO ORDERED. 26 DATED: April , 2008 27 HON. JEFFREY S. WHITE United States District Judge 28

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